

**RECEIVED**

BY \_\_\_\_\_ DATE 3/17/08

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**LEONARDO SEGATT,**

**Plaintiff,**

**v.**

**07 CV 11413 (WHP)**

**GSI HOLDINGS CORP., et. al.**

**ECF CASE  
MOTION FOR ADMISSION  
OF FRANK H. GRIFFIN, IV  
*PRO HAC VICE***

**Defendants.**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Angelo A. Stio III, a member in good standing of the bar of this Court and counsel for Defendants GSI Holdings Corp. and William J. Branch in this action, hereby move for an Order allowing the admission of:

Frank H. Griffin, IV  
 Pepper Hamilton LLP  
 3000 Two Logan Square  
 Eighteenth and Arch Streets  
 Philadelphia, Pennsylvania 19103-2799  
 215.981.4000  
 215.981.4750 fax

Mr. Griffin is a member in good standing of the bar of the Commonwealth of

U.S. DISTRICT COURT  
MAR 12 2008  
2008 MAR 12 PM 3:45

Virginia and the District of Columbia. There are no pending disciplinary proceedings against Mr. Griffin in any State or Federal Court.

Respectfully submitted,

  
\_\_\_\_\_  
Angelo A. Stio III (AS 7880)  
Pepper Hamilton LLP  
The New York Times Building  
37<sup>th</sup> Floor  
620 Eighth Avenue  
New York, New York 10018-1405  
*Attorneys for Defendants GSI Holdings Corp.  
and William J. Branch*

Dated: Princeton, New Jersey  
March 6, 2008

**TO:** Admissions Clerk  
U.S. District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Honorable William H. Pauley, U.S.D.J.  
U.S. District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LEONARDO SEGATT,

Plaintiff,

v.

GSI HOLDINGS CORP., et. al.

Defendants.

07 CV 11413 (WHP)

ECF CASE  
RULE 7.1 DISCLOSURE  
STATEMENT

Pursuant to Fed. R. Civ. P. 7.1. and to enable Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for defendant GSI Holdings Corp. ("GSI") certifies that GSI has no corporate parents, or publicly held corporations that own more than 10% of its stock.

Dated: March 6, 2008



\_\_\_\_\_  
Angelo A. Stio III (AS 7880)  
Pepper Hamilton LLP  
The New York Times Building  
37<sup>th</sup> Floor  
620 Eighth Avenue  
New York, New York 10018-1405  
*Attorneys for Defendants GSI Holdings Corp.  
and William J. Branch*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LEONARDO SEGATT, :  
v. :  
Plaintiff, :  
: :  
GSI HOLDINGS CORP., et. al. : 07 CV 11413 (WHP)  
: :  
Defendants. : ECF CASE  
: AFFIDAVIT OF ANGELO A.  
: STIO III ON MOTION FOR  
: ADMISSION OF  
: FRANK H. GRIFFIN, IV  
: PRO HAC VICE

STATE OF NEW JERSEY )  
: S.S.  
COUNTY OF MERCER )

ANGELO A. STIO III being duly sworn, deposes and says:

1. I am a Partner with the law firm of Pepper Hamilton LLP, counsel for Defendants GSI Holdings Corp. and William J. Branch (collectively “GSI Defendants”) in the above-captioned action. I am familiar with the pleadings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the GSI Defendants to admit Frank H. Griffin, Esq. as counsel *pro hac* vice to represent the GSI Defendants in this matter.

2. I am a member in good standing of the bars of the State of New York, State of New Jersey, and Commonwealth of Pennsylvania, and was first admitted to practice law in New York in January 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. Griffin since January 2008.

4. Mr. Griffin is a Partner in the law firm of Pepper Hamilton LLP, 3000 Two Logan Square, Eighteenth and Arch Streets, Philadelphia, Pennsylvania, and a member of the bars of the Commonwealth of Virginia (2002) and the District of Columbia (2003)..

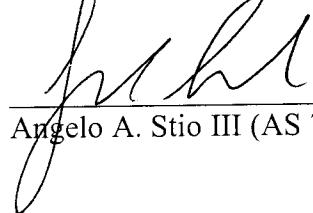
Certificates of Good Standing are attached hereto as Exhibit A and B.

5. I have found Mr. Griffin to be a skilled attorney and person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

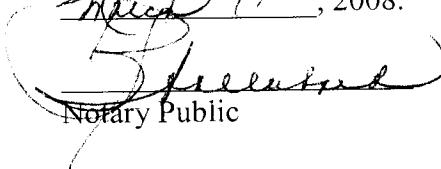
6. Accordingly, I am pleased to move for the admission of Frank H. Griffin, IV, *pro hac vice*.

7. I respectfully submit a proposed Order granting the admission of Frank H. Griffin, IV, *pro hac vice*, to represent the GSI Defendants in the above-captioned matter, be granted.

Respectfully submitted,

  
Angelo A. Stio III (AS 7880)

Sworn to and Subscribed  
before me this 6<sup>th</sup> day of  
March, 2008.

  
Notary Public

## **EXHIBIT A**

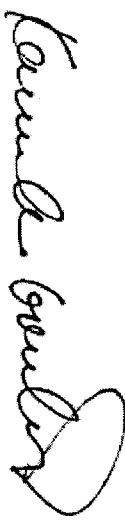
## VIRGINIA STATE BAR



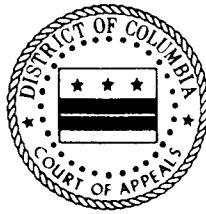
### CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT FRANK HASTINGS GRIFFIN, IV IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. GRIFFIN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 11, 2002, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

*Issued February 12, 2008*

  
Karen A. Gould  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

## **EXHIBIT B**



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

FRANK H. GRIFFIN, IV

---

was on the 7<sup>th</sup> day of April, 2003

---

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on February 15, 2008.

GARLAND PINKSTON, JR., CLERK

By: W.L. Charles  
Deputy Clerk

**CERTIFICATE OF SERVICE**

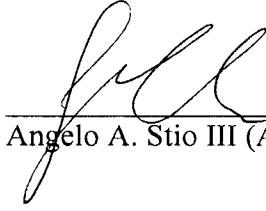
I hereby certify that on this 6<sup>th</sup> day of March 2008, a copy of the foregoing Motion for Admission *Pro Hac Vice*, along with the accompanying Affidavit of Angelo A. Stio III and Exhibits, was served by Federal Express overnight mail upon the following counsel of record:

Mark P. Zimmett, Esq.  
Law Offices of Mark P. Zimmett  
126 East 56<sup>th</sup> Street  
New York, New York 10022

*Attorneys for Plaintiff Leonardo Segatt*

David W. Haller, Esq.  
Covington & Burling, LLP  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018-1405

*Attorneys for Defendants Charlesbank Equity Fund V, Limited Partnership, CB Offshore Equity Fund V, L.P., Charlesbank Equity Coinvestment Partners Limited Partnership, Charlesbank Equity Fund V GP, Limited Partnership and Charlesbank Capital Partners, LLC*

  
\_\_\_\_\_  
Angelo A. Stio III (AS 7880)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
**LEONARDO SEGATT,** :  
:  
**Plaintiff,** :  
:  
**v.** : 07 CV 11413 (WHP)  
:  
**GSI HOLDINGS CORP., et. al.** :  
:  
**Defendants.** :  
:  
-----

**ORDER ADMITTING FRANK H. GRIFFIN, IV *PRO HAC VICE***

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2008, IT IS HEREBY ORDERED  
that Frank H. Griffin, IV is admitted *pro hac vice* to represent Defendants GSI Holdings Corp.  
and William Branch in this action.

---

The Hon. William H. Pauley, U.S.D.J.